



# Environmental and Social Management System

**SNC**

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## 1. INTRODUCTION

### 1.1 Background

SCN Former Public Company (“SNC” or “the Company”) and subsidiaries are principally engaged in the production of component parts for air-conditioners for automobile and the manufacturing and assembly of air-conditioning for household use. The Company was first established in 1994 and later expanded its business into the Original Equipment Manufacturer (OEM) business in 2007. Expanding work into upstream processes such as copper pipes, aluminium pipes, plastics, steelworks and heat exchangers. In 2016, the Company expanded its production base to factories located in Rayong province. With each expansion of the Company continues to manage their environment and social performance, certifying for management systems such as the International Standard of Organization (ISO 14001:2015) Environmental Management System (EMS) and the ISO 9001:2018 Quality Management System (QMS).

To further improve and manage the Company’s environmental and social risks and align with international standards, the Company has established this Environmental and Social Management System (SNC ESMS) to outline a systematic process for managing environmental and social risk imposed by the Company’s and its subsidiaries operations. The framework has been developed in accordance with Credit Guarantee and Investment Facility (CGIF)’s Environmental and Social Safeguards Policy.

This covers a process of engaging internal and external stakeholders, assessing potential risks, determining controls and management plans, monitoring and tracking performances, and reporting the performances.

### 1.2 Scope and Boundary

The scope of this ESMS covers Environmental and Social (inclusive of Community, Health and Safety) aspects relevant to activities conducted by the SNC and its subsidiaries using proceeds of CGIF’s guarantee. All existing activities and new opportunities shall follow the model of plan, do, check, act in order to continuously improve environmental and social performances. Requirements set forth by the management system applies to all employees, contractors and management level performing work for or on behalf of SNC.

Illustrated in **Figure 1** is the Environmental and Social Management System (ESMS) Framework. Comprising of seven elements (Environmental and Social Risk Management, Operational Control, Competency, Stakeholder Engagement, Supplier and Contractor Management, Emergency Preparedness, and Response and Monitoring and Review Process) to support the achievement of continuous improvement.

Under each element, the document has been structured such that the details cover the intent of each element, requirements to be carried out in order to meet the intent of the element and related documents (e.g. corporate/ plant level procedures/ tools).



**Figure 1 Environmental and Social Management Framework**

### 1.3 Environmental and Social Safeguard Applicable Requirements

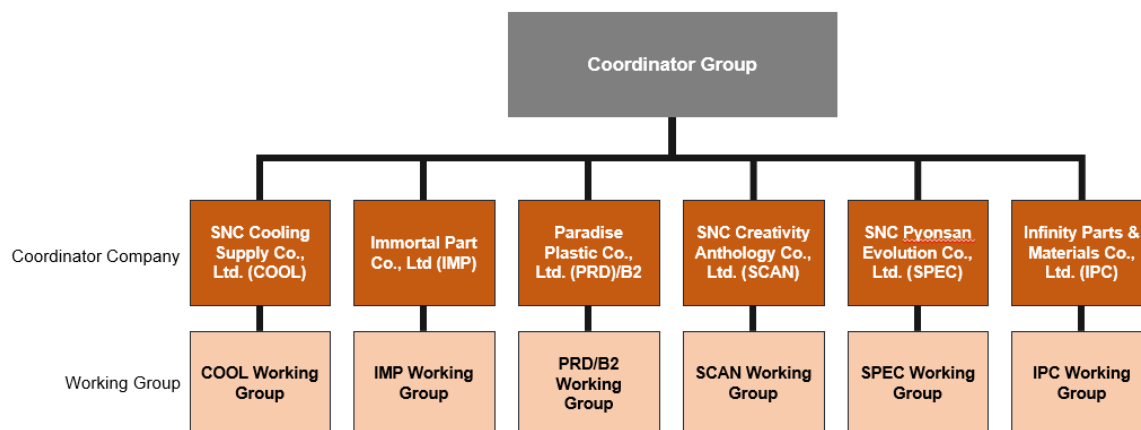
The Environmental and Social (E&S) Safeguards are a set of management processes and procedures (as detailed in the following sections) that enable SNC to identify, analyse, avoid, minimise and mitigate any potential adverse E&S impacts arising from its activities. E&S Safeguard Requirements shall be taken into account when determining opportunities for new project development, conducting risk assessments, identifying compliance requirements as well as monitoring and reporting parameters.

Detailed below are environmental and social safeguard requirements that should be referenced:

- Prohibited Investment Activity List (PIAL);
- Applicable national laws and regulations on environment, health and safety, labour, involuntary resettlement, land acquisition, indigenous people, physical cultural resources, and international laws adopted/ ratified by the local country (i.e. Thailand);
- CGIF's social requirements in relation to the core labour standards (e.g. International Labor Organization Convention).

## 1.4 Roles and Responsibilities

Clear establishment of roles and responsibilities are required to ensure effective implementation of management of environmental and social aspects. Hence, Figure 2 ESMS Organizational Chart illustrates the governing structure of SNC's ESMS.



**Figure 2 ESMS Organizational Chart**

Implementation and execution of the Environmental and Social Management System shall be supported by top management whereby key actions include:

- Signoff and endorse the policies subjected under the ESMS (e.g. Environmental and Social Policy, Human Resource Policy etc.).
- Acknowledge the Company's E&S performance and effectiveness of implementing the ESMS implementation.
- Appoint the Coordinator Group and Coordinator Company.
- Ensuring that sufficient resources are made available to effectively implement the ESMS at the Company operations; and
- Ensuring timely submission of annual Environmental and Social Safeguards Performance Report (ESSPR) to CGIF.

### **Coordinator Group:**

- Oversee the overall implementation of the ESMS and provide advice to Coordinator Company and Working Group to ensure that operations are carried out in compliance with the requirements.
- Ensure E&S risks are managed, and supports are available to continuously improve the E&S performance.
- Ensure that screening of new projects, including those using CGIF guarantees, are conducted in alignment with Asian Development Bank's (ADB) PIAL at a minimum.
- Ensure sufficient resources are provided to implement the ESMS.
- Ensure that reports according to the requirements of the ESMS are generated including the annual Environmental and Social Safeguards Performance Report (ESSPR) to be submitted to CGIF.
- Ensure that ESMS review and updates are undertaken.



**Coordinator Company:**

- Develop/update the E&S Policy to illustrate the Company's commitments to comply with international standards and applicable requirements.
- Review policies as part of the ESMS (e.g. Human Resource Policy) in alignment with international standards and applicable requirements for endorsement by the Top Management.
- Ensure appropriate allocation of resources to implement ESMS effectively (e.g. budgets and approval of work plans).
- Oversee environmental and social issues and support the overall implementation of the ESMS.
- Communicate E&S Policies and standards to all corporate departments and Plants.
- Conduct screening for new Projects/Opportunities against Screening Checklist and PIAL requirements and determine whether the Company is permitted to continue with opportunity.
- Review the screening of new activities at the existing Plants' operation conducted by ESMS Coordinators.
- Review compliance obligations and update internal compliance monitoring/audit procedure.
- Determine communication channels to be used with internal and external stakeholder. Ensure ESMS requirements are communicated to all Plants and subsidiaries of the Company.
- Identify training programs to develop E&S competencies.
- Determine E&S performance indicators required to be monitored and reported by Plant level and suppliers and contractors.
- Review E&S performance, analyse trends and ESMS implementation with Coordinator Group on a monthly basis.
- Organize a monthly meeting with all Coordinator Company representative to discuss on a monthly basis the ESMS implementation with ESMS Coordinators.
- Undertake internal reviews and audits on the implementation of the ESMS.
- Report ESMS performance and implementation status including gap analysis based on the monitoring and meet/discuss with the Coordinator Group on an as needed basis (at least once every three months).
- Submit the required E&S reports as specified in compliance obligations to CGIF and local authority.
- Provide recommendation on corrective and prevention measures, guidance to ESMS Coordinator to support the continuous improvement of the Company's E&S performance.

**Working Group**, consisting of representative such as the Plant Manager or ESMS Coordinator. Responsibility of each positions are as follows:

**Plant Manager**

- Accountable for the implementation of ESMS throughout the responsible facility.
- Provide sufficient resources to adhere with ESMS requirements.
- Appoint ESMS Coordinator to lead the implementation of ESMS.
- Review the plant's environmental and social performances against established key performance indicators and targets.



- Accountable for grievances raised by stakeholders (e.g. employees and communities) and resolve the grievances in the event that grievances are caused by the plant operations.

**ESMS Coordinator** (e.g. HSE Officer) from each plant

- Implement E&S operating procedures at Plant level.
- Ensure that employees carry out responsibilities in alignment with the ESMS requirements.
- Develop Plant level initiatives, programs and operating procedures in alignment with Plant E&S risks in order to promote an E&S culture throughout the Plant.
- Update E&S regulatory requirements and compliance actions required to be maintained at operational level.
- Report compliance status to Coordinator Company on an annual basis. Correct any non-conformities identified through the inspection and audit process.
- Track, monitor and report E&S performance (e.g. performance collected, inspection results, audit findings, suppliers and contractors performance etc.) and implemented action plans to Coordinator Company.

**Human Resource Department**

- Develop/update the Human Resource Policy in alignment with national regulatory requirements and international standards (e.g. International Labour Organization (ILO) Core Labour Standards)
- Provide input on effective communication and engagement channels for stakeholders.

**Employees:**

- Adhere to the E&S operating procedures, participate in the E&S programs established by the ESMS Coordinator relevant to their roles and responsibilities to support the achievement of the Company's E&S performance.
- Report any incidents, grievances, or E&S complaints/ issues observed to their respective supervisor or HSE Manager/ Officer.

*Relevant Documents:*

- Appendix A: ESMS Committee Appointment Letter

## 2. POLICY

### 2.1 Environmental and Social Policy

#### Environmental and Social Policy

SNC Former Public Company Limited (“SNC” or “the Company”) and its subsidiaries possess a wealth of experience in manufacturing household and automotive air-conditioners as well as parts and components of other electrical items. SNC is fully aware of the potential environmental and social risks and impacts caused by the Company’s existing and future operations. Thus, SNC is committed to implement an environmental and social management system (ESMS) to integrate relevant environmental, social, and health and safety (ESHS) aspects into the management of SNC’s existing and future operations.

This Environmental and Social Policy sets out SNC’s commitments to manufacture high quality products; minimize and mitigate adverse environmental and social impacts, where avoidance is not possible; and promote sustainability in accordance with all applicable legal and regulatory requirements, including international covenants ratified by Thailand.

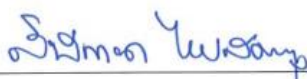
SNC commits to the following basic principles:

- Not investing in, or directly engaging in, activities listed in Asian Development Bank’s (ADB) Prohibited Investment Activities List (PIAL);
- Incorporating environmental and social risk considerations to the Company’s existing and future operations;
- Systematically managing ESHS risks and impacts associated with operation, through the process of identification, control, mitigation and monitoring;
- Creating a safe and healthy working environment by maintaining and continually improving ESHS performance;
- Safeguarding Indigenous Peoples (IP) from harm and sustainably managing any involuntary resettlement resulting from the Company’s actions;
- Building awareness with internal and external stakeholders (including neighbouring community) through provision of resources and training programs; and
- Monitoring the Company’s ESHS performance and updating the objectives and targets to achieve continuous improvement.

SNC management and employees are responsible for contributing positively to SNC ESHS culture in order to achieve sustainable development.



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ESMS Coordinator group  
Committee



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Vice to Chairman of the Executive  
Committee

## 2.2 Human Resource Policy

### Human Resource Policy

SNC Former Public Company Limited (“SNC” and “the Company”) and its subsidiaries are manufacturers of automotive and residential air conditioners as well as parts and components of other electrical items. SNC is committed to operate its business ethically and responsibly, and to protect the basic human rights of workers and all stakeholders.

SNC commits to the following basic principles:

- Adhering to applicable national labour and employment requirements including international covenants ratified by Thailand such as the International Labour Organization (ILO) Core Labour Standards;
- Promoting the fair treatment, non-discrimination and equal opportunity of workers by not tolerating any forms of harassment or discrimination (e.g. physical, mental, nationality, religion, gender, language, age, race, education, social status or other aspects).
- Creating a safe and healthy working condition, and promoting the health of workers;
- Protecting the workforce by not employing forced labour and child labour in all its existing and future operations and throughout the business value chain;
- Communicating and building competencies for all workers to ensure business are operated in line with fundamental human rights principle;
- Developing a process for managing human rights, covering the process of identifying risks and determining appropriate control measures;
- Establishing clear communication channels for stakeholders to report concerns and grievances;
- Respecting worker’s freedom of expression, freedom of association and collective bargaining; and
- Creating an organizational culture with good governance and business ethics.

Workers refers to the employees of SNC and non-employee workers (i.e. workers directly contracted by SNC, or contracted through contractors or other intermediaries).



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### 3. ENVIRONMENTAL AND SOCIAL RISK MANAGEMENT

#### 3.1 New Projects

Upon development of a new project, Coordinator Company will conduct a screening, categorization and impact assessment to ensure that environmental and social risks imposed by the new project are identified and controlled to minimize E&S impacts.

##### 3.1.1 E&S Risk Screening

*Purpose:*

- To identify potential environmental and social risk and impacts associated with the new project.
- To determine the significance of the potential environmental and social risk.

*Requirements:*

- Gather general information associated with the new project to support with the screening assessment. Information gather may include but is not limited to:
  - Project location, type and activity
  - Transportation route
  - Neighbouring facilities, infrastructures, and local community
  - Biodiversity conservation sites/ legally protected areas
  - Number of residents situated within the area of interest
- Ensure that activities completed as part of the new project are in alignment with CGIF E&S Safeguards requirements and is not listed in ADBPIAL (see Appendix B).
- Complete the following checklists:
  - Involuntary Resettlement Impact Checklist: to determine whether or not the project involves involuntary resettlement. In the event that the project involves involuntary resettlement, the scope of displacement and vulnerability of affected persons should be identified. Refer to Appendix C.
  - Indigenous Peoples Impact Screening Checklist: to determine whether or not there are impacts on Indigenous Peoples. In the event that Indigenous People are affected, a supporting Indigenous Peoples plan will be prepared. Refer to Appendix D.
  - Environmental Assessment Checklist: to understand the project siting and impacts on potential cultural heritage, biodiversity conservation areas and impacts to the surrounding community. Refer to Appendix E.

In order to ensure that environmental and social aspects (e.g. gender, biodiversity protection and conservation and impacts on affected persons) are considered throughout the life cycle of the project.

- Refer to the answers provided in the checklists, to identify potential environmental and social risks. E&S risks imposing additional liabilities, legal risks, expenses or project delays should be raised as primary area of focus. Consider using Appendix F as supporting Tool.

*Relevant Documents:*

- Appendix B: ABD Prohibited Investment Activity List
- Appendix C: Involuntary Resettlement Impact Checklist
- Appendix D: Indigenous Peoples Impact Screening Checklist

- Appendix E: Rapid Environmental Assessment Checklist
- Appendix F: E&S Screening Checklist

### 3.1.2 New Project Categorization

#### Purpose:

- To determine project risk levels and requirement for establishing safeguard measures.

#### Requirements:

- Review against national regulations to determine whether new project is classified and is required to conduct an Environmental Impact Assessment (EIA), Environmental and Health Impact Assessment (EHIA) or any other relevant studies (e.g. Initial Environmental Examination, Environmental Baseline Study, Public Participation etc.). *Notification of the Ministry of Natural Resources and Environment, No.2, B.E.2562 (2019), Re: Prescribing Projects, Activities, Operations required to conduct Environmental Impact Assessment (EIA) and Standards, Methodology and Conditions for completing the EIA and Notification of the Ministry of Natural Resources and Environment, No.2, B.E.2562 (2019), Re: Prescribing Projects, Activities, Operations required to conduct Environmental and Health Impact Assessment (EHIA) and Standards, Methodology and Conditions for completing the EHIA* outlines the type of projects required by Thai regulations to complete a EIA/EHIA.
- Adopt ES Safeguard project categorization definition into the screening process and assign appropriate category to the prospect project. Project category is determined based on the project type, location, scale, sensitivity and magnitude of the potential environmental and social impacts identified (e.g. impacts on the environment, indigenous persons, involuntary persons and biodiversity etc.).
- Use the following project definition for categorization to categorize the new project:
  - Category A: The proposed project is classified as category A if it is likely to have significant adverse environmental and social impact that are irreversible, diverse, or unprecedented. These impacts may affect an area larger than the Plant or property boundary subject to physical works. An environmental and social impact assessment is required.
  - Category B: The proposed project is classified as category B if its potential adverse environmental impacts are less adverse than those of category A. These impacts are Plant-specific, few if any are irreversible, and in most cases mitigation measures can be designed more readily than measures for category A projects. An initial environmental examination is required.
  - Category C: The proposed project is classified as category C if it is likely to have minimal or no adverse environmental and social impacts. No environmental and social assessment is required although environmental and social implications need to be reviewed.
- Based on the results of the categorization, determine additional control measures required to manage the identified environmental and social risks as well as monitoring and reporting parameters required for tracking ES performance.

#### Relevant Documents:

- CGIF Environmental and Social Safeguards Policy and Framework

### 3.1.3 E&S Impact Assessment

#### Purpose:

- To ensure all potential environmental and social risks are controlled and mitigated to an acceptable level.

#### Requirements:

- Refer to project category determined in the New Project Categorization Stage, SNC will be required to complete the following assessment depending on the category level:
  - Category A: Environmental and Social Impact Assessment;
  - Category B: Initial Environmental Examination; or
  - Category C: Environmental and Social Baseline Survey

In addition, SNC shall refer to Thai regulations for the types of project required Environmental, Health and Social Impacts studies to comply with the regulations (e.g. *Notification of the Ministry of Natural Resources and Environment, No.2, B.E.2562 (2019), Re: Prescribing Projects, Activities, Operations required to conduct Environmental Impact Assessment (EIA) and Standards, Methodology and Conditions for completing the EIA*)

- Determine need for engaging third-party assessors/ consultants/ specialist to support completion of Environmental and Social Assessment.
- Review assessment results to determine further action to address the environmental and social impacts identified. Depending on the project category this may include but is not limited to:
  - Routine Environmental and Social Monitoring Reports
  - Environmental and Social Baseline Studies
  - Mitigation and monitoring measures in alignment with the mitigation hierarchy (i.e. avoid, minimize, restore, remediate and offset of risk).
- Ensure risk assessment register is updated to reflect changes determined through the impact assessment.
- Proceed to implementing, relevant obligations, operational controls and monitoring of E&S performance as detailed in the following sections.

#### Reference:

- Project Specific E&S Impact Assessment Report

## 3.2 Existing Projects

For existing manufacturing facilities and operations prior to the development of this Environmental and Social Management System (i.e., Rayong and Samut Prakan plants), Plant HSE Officer/ ESMS Coordinator shall be responsible for conducting the risk identification and implementing the control measures to mitigate the risks to an acceptable level.

#### Purpose:

- To manage environmental and social risks associated with the Company's operations.

#### Requirements:

- Conduct risk assessment at Plant level using the steps as illustrated in Table 1:

**Table 1: Process for Establishing and Maintaining Risks and Impacts Register**

<b>No.</b>	<b>Step</b>	<b>Description and Requirements:</b>
1	Review of Operations	<ul style="list-style-type: none"> <li>Identify all activities undertaken of the Plant, step by step details should be provided to ensure</li> <li>Update the E&amp;S Risks and Impacts Register (Appendix F).</li> <li>Any activity that appears in the PIAL (Appendix A) will be highlighted and not be allowed to occur.</li> </ul>
2	E&S aspects and impacts identification	<ul style="list-style-type: none"> <li>Identify potential E&amp;S risks and impacts relating to the identified activities</li> <li>In the E&amp;S Risk and Impacts Register (Appendix F), use the information in the Register to identify the potential E&amp;S risks. Cross reference details with the relating E&amp;S impacts.</li> <li>Details for risk assessment shall be referred in the Risk and Impact Procedure</li> </ul>
3	Risks and impacts analysis	<ul style="list-style-type: none"> <li>Conduct an analysis of identified risks and impacts and identify significant risks (see section below), in line with the need to prioritise risks that should be addressed in the ESMS.</li> <li>Determining appropriate control measures to reduce the aspect, hazards and issues to an acceptable level. Control measures implemented may include, but is not limited to, elimination, substitution, engineering controls, administrative controls (e.g. training programs, additional inspections, work permits and work instructions) and personal protective equipment (PPE).</li> <li>Working in collaboration with relevant functions conducting operation activities to ensure that the determined control measures are effective.</li> </ul>
<i>Update</i>		
4	Review and Update Register	<ul style="list-style-type: none"> <li>The Environmental and Social Risk and Impacts Register and the associated controls should be reviewed and updated, when:               <ul style="list-style-type: none"> <li>There are changes in activities.</li> <li>There are changes in the Applicable Requirements; and/or</li> <li>Periodically (i.e., annually).</li> </ul> </li> </ul>

- Ensure activities reviewed cover both within its workplace and operation areas outside its workplace, such as customers' locations and public roads and identify relevant E&S hazards in its risk and impact assessment process.
- Develop Company level standards for E&S risks commonly faced at the Plant.
- Implement Company level standards for each Plant to control risks identified.



### Risk Rating

Once the risks have been identified, then there is a need to prioritise the significance of each risk so that the significant risks (i.e. risks that require the most attention) are addressed first (please note that future versions of the Local ESMS may evolve and as the system becomes more mature, evolve and cover other risks that are identified etc.). Priority should be given to the risks that have the highest probability of occurring and those that would have most severe impacts if they occurred.

### *Requirement*

- Complete the risk assessment form by first filling in the risks that you identify using the tools above. Then, assess the probability (low, medium, high,) that each risk will occur, and assess the potential severity (low, medium, high) of the impacts.

**Table 2: Assessing Risk Magnitude**

<b>No.</b>	<b>Step</b>	<b>Description and Requirements:</b>
1	Review of Risks	<ul style="list-style-type: none"> <li>▪ For each risk, there is a need to identify its significance based on the severity of the E&amp;S impact, likelihood of the impact, the duration and whether the impact is regulated under local legislation (or any of the other Applicable Requirements).</li> </ul>
2	Ranking	<ul style="list-style-type: none"> <li>▪ The significance for each activity should be ranked according to the likelihood of the risk occurring and the severity if it does occur.</li> </ul>
3	Applicable Standards	<ul style="list-style-type: none"> <li>▪ Review the risks that apply with reference to local E&amp;S legal and any other requirements and identify whether there are requirements that apply. Refer to Compliance Register (Appendix G).</li> </ul>
4	Prioritise	<ul style="list-style-type: none"> <li>▪ Define the overall significance for each risk, taking into consideration severity, frequency, legal requirements and normal/abnormal conditions. This should also consider:               <ul style="list-style-type: none"> <li>- Whether a risk and/or impact is fully reversible; and</li> <li>- Reputational risks if remedial/ mitigation actions are not implemented.</li> </ul> </li> </ul> <p>Refer to Figure 3 for risk probability and risk matrix.</p>

### *Update*

5	Actions	Based on the risk categorisation, appropriate strategies and/or control measures to address the risks and their potential impacts after implementation of the strategies/control measures should be developed. The ultimate goal is that, through the implementation of the strategies and control measures, the initial risk rating (i.e. High Risk) will be lowered to an acceptable level (i.e., Low Risk).
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- Develop guidelines/ procedures or provide guidance to the Plant on significant risk control methodology.

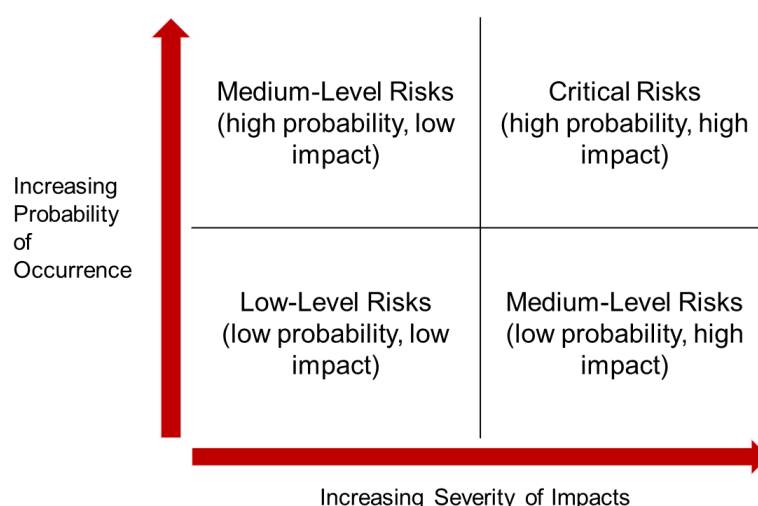
When developing guidelines/ procedures or providing guidance, consider the following:

As the probability of each risk is considered, there should be consideration of the circumstances of the operations and its local context. Relevant questions for likelihood may include:

- How many times has this risk led to a negative impact in the recent past? For example, if there are typically ten fire related injuries each year, it is likely that this trend will continue.
- Have there been any recent changes in the operations that may increase the vulnerability to risks? For example, has there been a need to include more contractors who have not been fully trained in safety procedures and may be more likely to make mistakes/suffer an injury?

Relevant questions for severity may include:

- How many people would be impacted if the risk were to occur e.g. would it result in severe injuries or the deaths of workers, would it impact on the business operations, would it impact the local community, would you lose an operating permits?



**Figure 3: Risk Probability and Severity Matrix**

- Ensure environmental and social risk assessment covers any changed activities (e.g. new processes, machinery, equipment, chemicals/ hazardous material, regulatory requirements etc.) conducted at the Plant.

#### Risk Management

- Review the risk identified to ensure completion, based on the operational activities of the Plants, examples of typical associated risks include:
  - Waste storage, handling and disposal – hazards associated with exposure and spillage;
  - Boundary (environmental) noise management – hazards associated with impacts on surrounding communities and external stakeholders;
  - Storage and use of flammable materials, e.g., diesel – fire hazards, environmental hazards associated with exposure and spillage;

- Use and storage of chemicals, such as mechanical oils – hazards associated with chemical exposure (via inhalation, dermal contact and/or ingestion) and hazards associated with spillage and contamination; and
- Operations at the workplace – physical hazards associated with insufficient lighting and/or ventilation, hazards associated with obstructed access to emergency exit(s) at the workplace.
- Develop measures to address risk whereby avoidance should be the first preference. Consider adopting the hierarchy of controls as listed below:
  - **Elimination:** the complete elimination of the risk by design (although this is often more practical for Plants under construction or those undergoing expansion or physical upgrades);
  - **Substitution/minimisation:** replacing the risk, material or process with an alternative one or significantly reduce the magnitude of the hazard;
  - **Engineering:** design in engineering controls or redesign the equipment or work process;
  - **Separation/isolation:** placing a physical barrier such guarding with an aim to limit/restrict access to it;
  - **Administrative:** providing administrative controls, such as training and procedures; and
  - **Personal Protective Equipment (PPE):** use of appropriate and properly fitted PPE where other controls are not practical.
- Implemented controls shall reduce identified risk to an acceptable level (i.e. low or medium risk), either by lowering the probability of the consequence or reducing the severity of the consequence or both.
- Note multiple control measures may be required to adequately address the risk.

*Relevant Documents:*

- Appendix G: Environmental and Social Risk Impacts Register

### 3.3 Compliance Obligations

*Purpose:*

- To ensure person working on behalf of SNC perform work in alignment with regulatory requirements.

*Requirements:*

- Develop a register of E&S legal requirements and obligations applicable to SNC's activities and operations. Examples of requirements may include:
  - Thailand Environmental, Health, Safety and Social Requirements;
  - CGIF's Environmental and Social Safeguards;
  - Borrower's requirements;
  - International Environmental and Social Standards such as ADB Environmental and Social Requirements, International Finance Corporation Environmental and Social Performance Standards; and
  - Customer's requirements.

- Communicate the requirements to responsible functions/ personnel to take ownership and identify the compliance actions
- Assess the compliance status by responsible functions/ personnel upon new/ updated regulations identified and assess the report the compliance status to Coordinator Company on an annual basis.
- Identify any corrective actions in the event on non-compliance.

*Relevant Documents:*

- Appendix H: Compliance Register Template
- Regulatory Compliance Register (SNC-FM-SHE-11)
- Monitoring Checklists

## OPERATIONAL CONTROLS

### 4.1 Operational Control Development

*Purpose:*

- To ensure environmental impacts (e.g. energy consumption, air emissions, noise, wastewater, chemical use) are managed and controlled within regulatory standards.
- To continuously improve environmental performances of SNC.

*Requirements:*

- Refer to the results of the environmental, health and safety and social aspects develop controls to manage environmental risks identified.
- Ensure risks are controlled to an acceptable level. Priority when developing controls should be given to high-risk aspects.
- Mandatory operational control frameworks for Plants are provided in Section 4.2 below.

### 4.2 Mandatory Management Framework

*Purpose:*

- To provide minimum requirements for managing key E&S risks from SNC's operations.
- To identify opportunity for improvement/ minimize E&S impacts.

## Human Rights Management Framework

*Requirements:*

- Develop a policy or statement, with references to international human rights standards and conventions regarding the Company's commitments to protect the work force (both local and migrant workers). Key commitments to be covered in the policy or statement shall include:
  - Effective abolition of child labour;
  - Elimination of discrimination in respect of employment and occupation;
  - Elimination of harassment or exploitation of individuals;
  - Elimination of all forms of forced or compulsory labour;
  - Freedom of association and the effective recognition of the rights to collective bargaining.
- Ensure alignment of commitment with internationally recognized standards and relevant national standards such as:
  - International Labour Organization's Core Labour Standards
  - *Regulation of the Ministry of Labour No.3 issued under the Labour Protection Act, B.E. 2541 (1998)*
  - *Foreign Labour Work Act, B.E. 2551 (2008)*
- Identify roles and responsibilities for implementing the Human Rights Management Framework. Include responsibilities for management representative to embed actions throughout the Company.

- Ensure that all supporting procedures and regulations relevant to employee work force are available in all employee's national language (e.g. Thai, Myanmar and Cambodian) and readily provided for employees.
- Review the E&S policies and supporting procedures on an annual basis or in event of change to ensure applicability with the Company's operations.

*Relevant Documents:*

- Human Rights Policy (Announcement Number SNC 026/2565)

## **4.2.2 Environmental Management**

*Requirements:*

- Based on the results of the environmental impact assessment/ environmental risk assessment, identify parameters required to be monitored. This is dependent on risk levels, regulatory requirements, objectives and targets determined by the Company.
- Establish programs to support environmental management. Example may include but is not limited to:
  - Environmental Objectives and Targets for significant environmental aspects;
  - Environmental Actions/ Management Plans to outline actionable items required to be undertaken by each function within the Plant and Corporate level to support the Company's achieve of E&S performance;
  - Environmental Awareness/ Training Programs (e.g. Risk Assessment, Waste Management, Chemical and Oil Handling, Energy Conservation);
  - Environmental Monitoring Programs (e.g. air emission monitoring, ambient noise, nuisances around surrounding communities)
- Review efficiency of programs developed on an annual basis in order to determine improvement.

## **4.2.3 Waste Management**

*Requirements:*

- Identify the different waste streams within the Company in order to estimate the potential volume generated. Different sources of waste stream may include from production line, cleaning activities, canteen facilities or medical/ first aid rooms. Waste may be categorized into one of the following categories:
  - General (Non-hazardous waste);
  - Hazardous waste;
  - Recyclable waste; and
  - Infectious waste.
- Assign a designated area for storing generated waste throughout the Plants. Containers characteristics shall be in alignment with regulatory requirement (e.g. made from durable material, appropriate sizing, insect resistant, not easily corrodible, has a lid, protected from spills to drainage, stored in a location our of direct exposure to sun light and on paved grounds etc.). Each type of bin shall have appropriate labelling to communicate the type of waste stored.

Bins shall be provided within the production line, around ancillary facilities and areas conducting activities by the Company employees.

- Practice waste segregation by designating one color bin for one type of waste. According to the Pollution Control Department, Ministry of Natural Resources and Environment, the following color coding practice should be implemented:
  - Blue/ Green bins: General non-hazardous and non-recyclable materials (e.g. packaging and food waste or organic waste from canteen area)
  - Yellow bins: Recyclable materials (e.g. paper, plastic bottles, aluminum cans)
  - Black bins: Hazardous materials (e.g. used light bulbs, batteries, hazardous waste from production process)
  - Red bins: Infectious waste (e.g. used bandages/ gauzes from first aid room).
- Develop labels for each waste type and display it clearly on the containers.
- Establish a waste storage inspection checklist and list out items required to be monitored on a routine basis (e.g. every week). Items to be monitored may include:
  - No signs of leakages;
  - No overflow of waste;
  - Waste is properly segregated; and
  - Spill response kit available in area storing hazardous materials.
- Designate a team to conduct routine inspection of the waste storage area.
- Identify a method for disposing each type of waste. The Company shall engage a licensed waste vendor to handle and dispose the generated waste. Multiple vendors may be engaged due to the varying types of waste generated.
- Prior to each disposal shipment, volume of waste generated shall be measured and recorded in an inventory system.
- Review generation records every three to six months to understand the volume of wastes generated by each Plant. Environmental objectives and targets should be established to support the objective of the Company to reduce waste.
- Consider adopting waste minimization approach by implementing following programs throughout the Plant to reduce the volume of waste generated . In order of priority, the Company should consider:
  - Eliminate waste (e.g. setting waste management targets, avoid over stocking or preparation of food in employee canteen);
  - Reduce amount of materials used (e.g. procuring raw materials with less packaging materials, implement routine maintenance programs to lessen faulty products, limit printing in offices);
  - Recover usable waste through:
    - Reuse (e.g. Reprocessing raw materials as substitution of virgin materials, reuse containers to be refilled);
    - Recycle (e.g. segregate recyclable materials from non-hazardous materials);
    - Recover/ treatment (e.g. contact partnering factories to send waste for recovery such as solvent reclamation, metal or metal compound reclamation); and



- Dispose waste as per methods prescribed in local regulations. Note, disposal method use are dependent on the type of waste being removed from the factory boundary.

*Relevant Documents:*

- Waste Management and Hazardous Waste Management (ESP-EMR-008 Rev.08)
- Waste Management Procedure (SNC-EP-SHE-05 Rev.01)
- Departments Waste Management Flow Chart and Disposal Method

#### **4.2.4 Water and Wastewater Management**

*Water Management:*

- Determine the water balance illustrating water coming into the facility and discharged from the facility.
- Consider possible water efficiency programs to optimize the consumption of water. Water efficiency programs may include but is not limited to:
  - Routine inspection of pipelines, equipment to identify possible leakages;
  - Placing reminder signs to turn off water taps while not in use;
  - Rerouting generated wastewater for use in other areas.
- Monitor and record water consumption in order to understand the water balance. Information illustrated in the water balance can help the Company in establishing short and long-term targets for water consumption.

*Wastewater Management:*

- Identify sources of generated wastewater (e.g. from domestic activities, canteen and pantry, manufacturing processes and cleaning).
- Collect wastewater from all sources via wastewater collection system and direct to wastewater treatment system. Wastewater treatment units include, but not limited to, holding tanks, equalization tank, chemical treatment, biological treatment, sedimentation tank, disinfectants, sludge removal and discharge to permitted effluent receiving locations e.g. the municipality's central wastewater treatment plant or permitted public waters.
- Develop an operating procedure for wastewater treatment detailing the process used for treating process wastewater, treatment standard limits, inspection and monitoring schemes, reporting requirements (i.e. internally and externally).
- Conduct routine monitoring and sampling of wastewater treatment plant to ensure that the treated quality is in alignment with regulatory requirements. Examples of parameters required to be monitored may include but is not limited to:
  - Monitoring chemical levels feed to treatment system;
  - Efficiency of treatment system;
  - Functioning of treatment system, equipment, instrument and devices; and
  - Effluent quality.
- In the event that abnormality or exceedance are identified, the responsible team shall identify root cause and correct the abnormality as soon as possible.
- Refer to waste and hazardous waste management procedure for disposal of sludge generated from the wastewater treatment process.

*Relevant Documents:*

- Wastewater Treatment System Operating Manual (SNC-EP-SHE-11)
- Recording of Wastewater Quality Testing
- Waste Management and Hazardous Waste Management (ESP-EMR-008 Rev.08)
- Waste Management Procedure (SNC-EP-SHE-05 Rev.01)

**4.2.5 Chemical and Hazardous Material Management***Requirements:*

- Develop an inventory of all chemicals and hazardous materials possessed, stored, utilized at each facility. Details that should be recorded in the inventory may include but is not limited to:
  - Name of chemical/ hazardous material
  - Volume/ quantity stored
  - Area of use
  - Safety Data Sheet (SDS)
  - Associated regulatory requirements (e.g. monitoring and/or reporting requirements)
- Develop a chemical and hazardous material management procedure. Steps that should be included in the procedure should include the process of:

**Table 3: Process of Chemical Handling**

<b>Topic</b>	<b>Details that should be covered:</b>
Selecting Vendor and Receiving chemicals	<ul style="list-style-type: none"> <li>▪ Supplier selection (refer to Procurement Procedure)</li> <li>▪ Development of checklist for visual inspection requirements</li> </ul>
Storing chemicals	<ul style="list-style-type: none"> <li>▪ Identification and inspection of designated storage location</li> <li>▪ Compatibility analysis</li> <li>▪ Availability of labelling on containers and safety data sheets</li> <li>▪ Maintaining records of volume, quantity, type of chemicals stored</li> </ul>
Transferring chemicals	<ul style="list-style-type: none"> <li>▪ Provision of spill control kits and personal protective equipment (PPE)</li> </ul>
Use of chemicals	<ul style="list-style-type: none"> <li>▪ Hazardous communication</li> <li>▪ Provision of PPE at workplace and emergency response equipment</li> <li>▪ Transfers to hazardous waste storage areas</li> </ul>
Disposal of used chemicals	<ul style="list-style-type: none"> <li>▪ Selection of licensed hazardous waste collector and disposal method</li> <li>▪ Hazardous waste reporting (refer to Waste Management Procedure)</li> </ul>
Training	<ul style="list-style-type: none"> <li>▪ Identification of training needs and programs for personnel working with chemicals (e.g. Hazard Communication, Use of Personal Protective</li> </ul>

<b>Topic</b>	<b>Details that should be covered:</b>
	<p>Equipment, Use of Emergency Equipment, Reporting in event of Emergency).</p> <ul style="list-style-type: none"> <li>▪ Establishment of process to assess efficiency of training provided.</li> <li>▪ Recording training participants.</li> </ul>

#### *Ozone Depleting Substance (ODS):*

- Identify equipment and/or products containing ODS (e.g. hydrochlorofluorocarbons: HCFCs or R-22 refrigerant) into a master list.
- Ensure relevant regulations regarding Thailand's requirements to phase out imports and use of HCFCs are captured in the compliance register.
- Establish target to phase out the use of ODS. For example for internal consumption and for within production line.
- Develop a time bound phase-out action plan for using R-22 substance in the manufacturing of automobile and residential air conditioning units within the manufacturing facility. This may include consideration on:
  - Investments;
  - Technical change (e.g. transition to other refrigerants that are non- ODS or lower global warming potential);
  - Communication with clients procuring products containing ODS;
  - Compliance with regulatory requirements;
- Communicate and implement determine actions throughout the Company.
- Provide the HCFC phase out time bound plan and annual HCFC use certificate to GCIF in line with the conditions of the financing agreement

#### *Relevant Documents:*

- Hazardous Substance Management Procedure (SNC-EP-SHE-06)
- Appendix I. R22 Phase Out Plan

### **4.3 Occupational Health and Safety Management**

#### *Requirements:*

- Identify hazards imposed from conducting activities at the Plant. This can be achieved by conducting a risk assessment.
- Based on the risk assessment results, identify high-risk activities in order to determine control measure. Examples of possible high risk activities may include, but is not limited to:
  - Working in confined spaces
  - Hot Work
  - Working at height
  - Electrical work

- Develop controls/ measure to create a safe work practices for employees. Determined controls may follow control hierarchy of:
  - Elimination – removal of hazards from workplace, this may include changing work process or use of hazardous substance imposing health and safety hazards;
  - Substitution – finding safer alternatives for the source of hazard. Substitute identified should reduce the potential harmful effects of the hazard and not impose additional risks;
  - Engineering controls – eliminating the hazards/ remove employees from the source of the hazards;
  - Administrative or Procedural Controls – adjusting the way of work to reduce exposure to hazards via administrative and procedural/ work instructions; and
  - Personal Protective Equipment – provision of PPE to protect workforce.

Examples may include but is not limited to:

- Permit to work system (e.g. hot work, work at height, confined space)
  - Accident Reporting and Investigation Procedures
  - Contractor Management Procedures
  - Employee medical surveillance program
  - Workplace monitoring programs (i.e. noise, light, heat, chemical concentration)
  - Log-out/ Tag-out (LOTO) program
  - Personal Protective Equipment (PPE) assessment
- Review the effectiveness of the controls implement to ensure that the risk levels are minimized to an acceptable level.
  - Review and determine additional controls as necessary (e.g. based on incident/ injury statistics)

#### *Relevant Documents:*

- Procedures/ tools in alignment with controls/ measures determined necessary

## **4.4 Community Health and Safety Management Framework**

### *Purpose:*

- To avoid the adverse impacts on community health and safety
- To ensure that the quality and safety of communities are maintained and preserved through implementation of effective mitigation measures.

### *Requirement:*

- Refer to impacts identified to affect community as part of the E&S impact assessment process.
- Develop measures to avoid or minimize potential for community to be exposed to health risks arise from Plant's construction/ operation activities. This may include but is not limited to:
  - Pollution control
  - Contaminated resources
  - Traffic safety

- Influx of diseases due to introduction of foreign workers (e.g. water borne, water based, water related, communicable disease)
- Participation in annual emergency preparedness and drill responses, in order to raised awareness and allow community to have an active roles.
- Communicate channels for raising concerns/ complaints to the surrounding communities, refer to details in Section 5.2 Communication. Plans and communication channels shall be made in an easy to understand matter.

*Relevant Document:*

- Environmental Health and Safety Training Plan

## COMPETENCY

### 5.1 Training and Awareness

*Purpose:*

- To develop internal organizational capacity regarding E&S management relevant to Plants operating activities.

*Requirements:*

- Determine training programs relevant to environmental and social management and raising environmental and social awareness. Assigned training programs shall be in line with individual's roles and responsibilities as illustrated in Figure 2. Examples of training include:
  - Environmental and Social Management System Framework
  - Stakeholder Engagement Program
  - E&S Risk Identification and Management
  - Emergency Response and Drills
  - Environmental Management Frameworks
  - Occupation Health and Safety Management Frameworks
  - Specific training required for employees to carry out their roles and responsibilities
- Develop an annual training plan to all types of training required to be delivered. Training plan shall specify intended date of completion, targeted department and facility delivering the training (i.e. internal or external resources).
- Request for feedback from training participants to determine efficiency of the training program delivered.
- Ensure documentation of training course and names of participants as documentation can be request by regulatory authority to demonstrate compliance.
- Review and update the training plan at least twice a year to ensure that planned training have been delivered.
- Develop initiatives and programs to raise awareness on E&S risks throughout the Company.

*Relevant Documents:*

- Appendix J: Environmental Health and Safety Training Plan
- Training Record

### 5.2 Communication

*Purpose:*

- To establish channels for routine communication regarding project plans, operations, and performance to all relevant stakeholders.
- To ensure communication are transparent and efficient.

*Requirements:*

- Identify internal and external stakeholders/ interested parties and determine E&S topics. For internal stakeholders this shall be E&S topics required to be communicated, whilst for external stakeholders this shall be topics of interest/ concerned based on SNC operations.

- Develop communication plans for each group of stakeholders based on the interest/ concerns. The plan shall provide information on the stakeholder groups, topics to be communicated, frequency, communication channels and responsible persons.

Communication channels may include, but is not limited to the following:

- Morning talks/ Meetings /Toolbox talks
- Display information on notice boards accessible by all employees/ workers (for internal information) and community (for external information). Information shall be provided in language understood by foreign migrant workers (i.e. Myanmar and Khmer language).
- Company activities
- Electronic communication methods (e.g. Line application/ email channels)
- Employee/ Customer/ Supplier engagement survey
- Community survey (within a 3 kilometre radius)
- Annual and Sustainability Report

Examples of topics to be communicated to stakeholders may include:

- Environmental and Social Policy
  - Environmental and Social Impact Assessment
  - E&S Roles and Responsibilities
  - Occupational health and safety
  - Community health and safety
  - Operational Control Procedures
  - Emergency Response Plan
  - Templates for Documenting Plans
  - Summary of Environmental and Social Monitoring and Reporting
- Implement the communication plan throughout the Company. For community located in close vicinity, additional information disclosure as followed should be announced:
    - Environmental and Social commitments;
    - Environmental and Social concerns and issues (both positive and negative); and
    - Final/ updated Initial Environmental Examinations (depending on regulatory requirements) and Environmental and Social Management Plans (ESMP), Resettlement Action Plans (RAP) and Ethnic Group Development Plans (EGDP) as applicable.

General public should be allowed to provide meaningful inputs to the Company to support continuous improvement of E&S performances.

- Ensure information disclosed/ communicated are made available in a timely manner, in a form and language easily understood by affected peoples, stakeholders and all groups of workers including migrants. For migrant workers, communication materials shall be available in native language of all workers.
- Establish a recording process to document any feedback/ complaints/ issues raised regarding E&S from both internal and external stakeholders. Timely response shall be made to feedback/ complaint/ issue owner.



*Relevant Documents:*

- Appendix K: Communication Plan for SNC Stakeholders
- Stakeholder Engagement Plan

## STAKEHOLDER ENGAGEMENT

### 6.1 Stakeholder Engagement Plan

#### *Purpose:*

- To provide guidance on development and implementation of a Stakeholder Engagement Plan.
- To set out standards for managing and responding to stakeholder concerns/ expectations.
- To engage with internal and external stakeholders efficiently, ensuring support for permit to operate.

#### *Requirements:*

- Identify project stakeholders via primary and secondary data collection (for new projects) or engagement activities with local community. Examples of key stakeholder groups may include, but not limited to:
  - Employees
  - Investors
  - Customers
  - Neighbouring community
  - Partners
  - Competitors
  - Permitting authority/ local authority
  - Media
  - Sensitive receptors (e.g. local community, schools, temples, hospitals, within a 3 kilometre of the facility etc.)
- Identify and understand the interest, issues, concerns and expectations of each stakeholder group. Establish the associated stakeholder influence and interest levels.
- Prioritize each stakeholder group based on their level of interest and influence level. This determine which stakeholders are required to be managed closely, kept satisfied, kept informed or just monitored.
- Determine appropriate engagement process, tools and channels for communicating with stakeholders. Determined engagement process based on project phase; feasibility and construction phase for new projects or operation phase for existing projects.
- Build strong relationship and trust through frequent and transparent communication.
- Engage vulnerable groups through adopting an inclusive approach to conduct meaningful consultation particularly at the beginning of project implementation to understand and address concerns raised by those who are affected. A meaningful consultation can be achieved when:
  - The engagement process is conducted early in the project cycle
  - Timely disclosure of relevant information are made to affected persons
  - Consultations are made in a safe, comfortable and inclusive environment
  - Allows stakeholders to express their views.
- Communicate to stakeholders' available channels for raising concerns/ issues stakeholders may have. Methods shall be in accordance with the channels established in the stakeholder engagement process.

- Manage expectations/ concerns of stakeholder by monitoring the records of grievances, complaints, suggestions made to SNC.
- Update stakeholder on a routine basis the Company's E&S performance.
- Review and update the established Stakeholder Engagement Plan on an annual basis or in an event of change in activities.

*Relevant Documents:*

- Appendix K: Communication Plan for SNC Stakeholders
- Stakeholder Engagement Plan

## 6.2 Grievance Mechanism

*Purpose:*

- To have in place a system for reporting, recording and handling complaints/ issues raised by stakeholders.
- To provide remedy in areas issues raise impose negative impacts.

*Requirements:*

- Establish channels for receiving grievances and communicate the channels to relevant stakeholders both internal and external. Examples of channels used to engage include:

Internal stakeholders

- Direct report with supervisors
- Telephone (i.e. 02-108-0370 ext. 76 for public relations/ Company secretary) or instant messaging application (i.e. "Line")
- Employee engagement/ satisfaction surveys
- Emails to the following management (i.e. [sineenart@sncformer.com](mailto:sineenart@sncformer.com)) or investigation team (i.e. [sirote@fispri.org](mailto:sirote@fispri.org))

External stakeholders

- Dedicated e-mail addresses (e.g. on Company Website) or telephone numbers
- Stakeholder engagement sessions (e.g. with community, regulators)
- Designated responsible person for each stakeholder group

Anonymous complaints shall be allowed for any complaint receiving channels.

- Assign a focal point/ responsible person for each stakeholder group.
- Validate and document grievance reported. Information that shall be documented includes name of personnel reporting the grievance, date, topic of grievance, determined follow up actions and status of closure.
- Upon receiving grievances, undertake the following process to handle grievances received:
  - Assign point of contact for each grievances raised.
  - Screen and validate the grievance raised. Additional details may be required from complainant (as possible) to assist the factual assessment of the complaints.

- Review against other GRMs for similar occurrence and inputs on previous corrective/preventive actions implemented.
- Evaluate and investigate the complaint, this may require consultation with subject matter experts.
- Formulate appropriate resolution and develop a response for the complainant. For complaints raised by internal stakeholders responses can be made in person during dedicated meetings, anonymous complaints may be communicated via future programs planned to be implemented at the Plant while complaints raised by external stakeholders may be responded via formal letters, telephone conversations or face to face meetings.
- Implement the determined resolutions to eliminate causes of grievance and avoiding possible reoccurrences.
- Track, monitor, document and close out the complaint.
- Assign responsible to implement measures, update progress of corrective and prevent actions determined to address the grievance issue.
- Grievances reported shall be treated with confidentiality.

*Relevant Documents:*

- Grievance Handling Procedure
- Appendix L: Grievance Register

## SUPPLIER AND CONTRACTOR MANAGEMENT

### 7.1 Supplier Selection and Management

#### *Purpose:*

- To incorporate environmental and social aspects into the supplier and contractor management process particularly for suppliers and contractors with high E&S risks.
- To control E&S risk impacts imposed by contractors while conducting task on behalf of SNC.
- To establish process for monitoring and evaluating suppliers' and contractors' performance.

#### *Requirements:*

- Assess potential supplier's and contractor's E&S risks and identify though with high E&S risk. This may include suppliers and contractors providing labour, hazardous raw materials etc.
- Ensure that prospective suppliers and contractors are compliant with the national labour laws and internationally recognized core labour standards.
- Ensure that prospect suppliers and contractors are not involved in any related activities that appears on the ADB's Prohibited Investment Activities List (PIAL) specially compliance with the Thailand Government ratification of the Montreal protocol (MP) dated 7 July 1999 and the ratification of the Beijing Amendment to the MP dated 14 November 2016 as well as obligations contained in relation to the phase-out of ozone depleting substances (ODS) including hydrochlorofluorocarbons (HCFCs).
  - In the event that prospect supplier and contractors pass the screening process, supplier and contractor shall be added to the Approved Supplier and Contractor List.
  - In the event that prospect suppliers do not pass the supplier and contractor screening checklist or are involved in any activities that appears in the PIAL, prospect supplier will be deemed unsatisfactory for the Company for 3 years prior to be eligible for re-assessment.
- Incorporate E&S criteria as part of the supplier selection. This may include considerations on:
  - Post-project appraisals from previous jobs
  - Previous experiences, competencies (e.g. completed training, licenses and certificates);
  - Occupational health and safety records (e.g. injury performance history for the last 3 years) and Environmental and Social (labour) records (e.g. supplier prosecution history);
  - Environmental and Social Management Systems/ certification with international or national environmental technical standards or specifications (e.g. International Organization of Standardization: ISO 14001: 2015 or European Committee for Standardization: CEN)

Supplier selected should have the capability to conform to minimum Environmental and Social requirements (e.g. compliance to local/ national environmental and social regulatory requirements).

- Prepare a contractual requirement between the Company and the selected supplier and contractors. Clauses in the contract shall be appropriate to the level of E&S risks. Examples of clauses for high risk E&S supplier and contractors may include:
  - Adherence with all applicable environmental laws, regulations and standards including chemical and waste management and disposal, recycling wastewater treatment and

discharge, air emission controls and other environmental and social related requirements;

- Implementation of an Environmental and Social Management System;
  - Implementation of Environmental and Social management plans;
  - Environmental and Social organizational structure/ roles and responsibilities; and
  - Documentation of Environmental and Social performances.
- Prior to commencing services, supplier's orientation should be performed to ensure availability of management plans and procedures in order to control associated risks.
  - Require high E&S risks supplier and contractor to report performance on a routine basis. Indicators required to be reported may include but is not limited to:
    - Number of incidents/ accidents (i.e. near miss, first aid case, lost time, medical treatment cases)
    - Total working hours
    - Number of complaints from neighbouring communities
  - Establish a process to monitor supplier and contractors performance on a routine basis during the execution of the contracted work.
  - Upon completion of the contract, a close out performance evaluation shall be completed to assess overall performance.
  - Use performance evaluation results to determine possible areas of improvement in supplier and contractor selection process.

*Relevant Documents:*

- Appendix M: Procurement Policy
- Appendix N: Supplier Code of Conduct
- Appendix O: Supplier Evaluation Performance Report

## EMERGENCY PREPAREDNESS AND RESPONSE

### 8.1 Emergency Response Plan

#### *Purpose:*

- To determine applicable emergency scenarios based on the Company's operations and develop corresponding emergency response plans.
- To comply with existing national laws on emergency response.

#### *Requirements:*

- Identify different emergency scenarios with potential to occur at the Plants. This may include:
  - Flooding/ Natural Disasters;
  - Fire Emergency;
  - Chemical or Hazardous Substance Leakages; and
  - Liquid Petroleum Gas Leakages.
- Develop emergency response plans for each emergency scenario. The plan shall encompass all potential hazards and emergencies that may take place. Details of the emergency response play may include but is not limited to:
  - Scope and Boundary;
  - Roles and Responsibility of emergency response team;
  - Actions to do conduct in event of emergency, safety practices (e.g. emergency workflow);
  - Monitoring and inspection of emergency response/ personal protective equipment (e.g. emergency suppression equipment layout);
  - Training and drills; and
  - Emergency contact numbers (e.g. fire brigade, hospitals, police department).
- Communicate the emergency response plan to employees and contractors performing work on behalf of the Company. Emergency response plans can be communicated in during training sessions and/or made available throughout the workplace.
- Provide resources for responding to emergencies (e.g. fire suppression equipment, personal protective equipment, etc.)
- Ensure routine inspection of the emergency response equipment to be in a ready to use condition.

#### *Relevant Documents:*

- Emergency Preparedness and Response – Fire Emergency (SNC-WI-SHE-01)
- Emergency Preparedness and Response – Chemical Spill Response Plan (SNC-WI-SHE-02)
- Emergency Preparedness and Response – LPG Leaks (SNC-WI-SHE-03)
- Emergency Drill Reports
- Emergency Training Records



## MONITORING AND REVIEW

### 9.1 Monitoring and Reporting

#### *Purpose:*

- To monitor, analyse and report E&S performance on a routine basis and communicate to relevant stakeholders.
- To monitor, record and report EHS parameters as prescribed by national regulatory requirements.

#### *Requirements:*

- Update E&S parameters required to be monitored/ reported, methodology for collecting performance and monitoring frequency. Examples of parameters required to be monitored may include but is not limited to:
  - Wastewater effluent quality;
  - Waste generation/ spills/ drips
  - Quantity of hazardous substance/ chemicals
  - Noise level
  - Occupational health and safety incidents
  - Training completion
  - Incidents
  - Grievance cases
- Assign responsible personnel to conduct the monitoring, record the performance and submit to the HSE Manager for consolidation.
- Monitor performance against key performance indicators. Examples of key performance indicators include but is not limited to:
  - Non-compliances (e.g. zero non-compliance)
  - Volume of waste generated (e.g. % reduction)
  - Compliance of wastewater treatment quality as per regulatory requirement
  - Number of employees and workers who complete E&S training
  - Number of loss time injuries and incidents leading to loss time injuries
- Ensure all significant E&S impacts are reported to CGIF within 24 hours of the occurrence inclusive of the determined corrective measures. Examples of significant E&S impacts will include but is not limited to:
  - The release of any hazardous substance on or from any property associated with the Company other than in accordance with the Environmental and Social Safeguard Requirements;
  - Any unanticipated incidents, accidents or circumstance which has resulted in or is likely to result in significant, severe or irreversible damage or impacts on the environment, or damage, impact or harm to the lives, livelihood, quality of life, health, safety, security, property or cultural heritage of affected people;
  - Any incidents or accidents in connection with the Company resulting in death or significant injury; and
  - Any material explosion or fire at or on any property associated with the Company.

- Analyse consolidated performance report, with respect to trends/ statistics to determine performance level and additional measures required to ensure the Company's E&S commitments are achieved.
- Communicate performance according to the requirements Communication section.

## 9.2 Inspection and Audit

### *Purpose:*

- To establish a process for inspecting Plant level E&S performance.

### *Requirements:*

#### **Inspection**

- Develop an inspection schedule which entails items required to be monitored, frequency of monitoring and responsible departments required to conduct the inspection.
- Develop an inspection checklist to review implementation of the developed control procedures. Examples of checklists may include but is not limited to:
  - Regulatory compliance checklist
  - Emergency equipment checklist (e.g. fire response equipment, fire system, alarms etc.)
  - Waste handling and transportation checklist (e.g. waste storage area)
  - Hazardous material handling and storage checklist (e.g. availability of spill kits, storage conditions)
  - Health and Safety at workplace
  - Use of R-22

Note, depending on the competencies available within the Plant, technical inspections (e.g. Use of R-22) can be assigned to external inspectors.

- Provide training to Plants' employees to ensure competency and adherence to the control measures developed.
- Assign responsible personnel for conducting routine inspections as well as determining corrective and preventive actions. Assigned personnel shall conduct routine inspections of the physical facilities, systems, equipment use, conditions which may lead to environmental and social concerns and any potential non-compliance issues.
- Communicate observations found with the area owner to address observations as soon as possible.
- Record and maintain inspection results for use during internal and external audit sessions.

#### **Internal and External Audit**

##### *Pre Audit*

- Identify the scope of each audit required to be conducted e.g. ESMS, Management System audit (ISO audit), regulatory compliance etc.
- Assign a designated team to be the auditing team. The auditing team should comprise of personnel with understanding of the management system, ES safeguards and local regulations. This is to ensure that the team will be able to identify compliance and areas of improvement.

- Determine a criteria for classifying non-conformities. The classification will inform the impact of the non-conformity and the time frame permitted to close out the non-conformity. Impact of non-conformity may include non-conformity to management system requirements, regulatory requirement and impacts on business reputations.

#### *Audit*

- Inform relevant personnel that an audit will be conducted in order to request for support and collaboration from the Plant. The scope, objectives and process of the audit should be clearly stated.
- Utilize methods of site walks, interviews and document reviewing to better understand practices adopted by the working team.
- During the audit, performance of the operating team will be assessed against the applicable standards. Auditors should aim to create a collaborative working atmosphere. Observations and non-conformities will be assessed based on:
  - Interviews with the working personnel to ensure requirements have been communicated
  - Visual inspection of the working area. Priority should be given to observing implementation of documented requirements to operational practices.
  - Review of documentation and records
- In the event that it is observed that the team being audit is defensive of topics being discussed, reassure the team that the exercise is a process that support the overall improvement of the Plant.

#### *Post Audit*

- Record any observations, areas of improvement in an audit report template. The record should then be used for as part of the nonconformity management process and determining corrective and preventive actions. Refer to details of non-conformity handling in Section 9.3 Corrective and Preventive Actions.
- Documented findings can be shared with the responsible team.

#### *Relevant Documents:*

- Workplace Audit Checklist (SNC-FM-SHE-11)
- Management System Internal Audit Checklist (SNC-FM-SHE-02)

## **9.3 Corrective and Preventive Action**

#### *Purpose:*

- To establish a system for identifying nonconformities against requirements and obligations.
- To determine corrective and preventive actions for observations and areas of improvement identified through the auditing process.

#### *Requirements:*

- Based on observations from routine inspections and/or audit, report all significant E&S impacts to CGIF within 24 hours of the occurrence inclusive of the determined corrective measures. Examples of significant E&S impacts will include but is not limited to:

- The release of any hazardous substance on or from any property associated with the Company other than in accordance with the Environmental and Social Safeguard Requirements;
- Any unanticipated incidents, accidents or circumstance which has resulted in or is likely to result in significant, severe or irreversible damage or impacts on the environment, or damage, impact or harm to the lives, livelihood, quality of life, health, safety, security, property or cultural heritage of affected people;
- Any incidents or accidents in connection with the Company resulting in death or significant injury; and
- Any material explosion or fire at or on any property associated with the Company.
- Auditing team shall determine corrective and preventive actions for each observation and area of improvement identified. This would include the process of:
  - Determining root causes
  - Develop actionable corrective and preventive actions
  - Designate timeline for closure
  - Issue the corrective action request to responsible personnel.
- Corrective action request issued shall include the following information:
  - Description of non-conformity
  - Root cause/ source of issue
  - Corrective and preventive action planned (there can be more than one corrective and prevention action per non-compliance).
  - Responsible personnel for tracking completion of corrective/ preventive action
  - Reference number for future tracking.
- Conduct tracking and monitoring of the corrective action request issued. A review of the overall efficiency of the corrective and preventive actions should be conducted. Points of consideration includes:
  - Whether the corrective and preventive actions were implemented properly;
  - Whether the corrective and preventive actions determined effectively addressed the non-conformity identified;
  - Whether post implementation of the actions, the likelihood of reoccurrence reduced.

*Relevant Documents:*

- Appendix P: Corrective Action Request form

## **9.4 Performance Reporting and Review**

*Purpose:*

- To review ESMS implementation and performance on a regular basis.
- To inform ESMS performance to relevant stakeholders, obstruction and obtain guidance/ direction from management for performance improvement..

*Requirements:*

- Record, prepare and submit reports to regulatory authorities as detailed in the Environmental, Health and Safety Plan. Refer to Table 4 for examples of reports required to be submitted to authorities.

**Table 4: Example of reports required by Thai regulations**

<i><b>Topic</b></i>	<i><b>Reporting Frequency</b></i>	<i><b>Due Date</b></i>
Chemical Possession Inventory	Once a year	Within January
Chemical Hazard Risk Assessment	Once a year	Within June
Wastewater Quality Monitoring	Monthly	Every month
Air Emissions from Stack	Twice a year	Within June and December
Environmental Monitoring	Twice a year	Within June and December
Employee working with chemical Health Examination Results	Once a year	Within December
Removal of Waste from Factory Boundary	Dependent on removal date	
Annual Waste Report	Once a year	Within January
Fire Emergency Drill	Once a year	Within December
Workplace Monitoring (i.e. Noise, Illumination, Temperature and Chemical Concentration)	Once a year	Within June

- Schedule meetings to review E&S performance data collected. In order to determine whether the ESMS was implemented efficiently or not. The meeting should include participants from management level as well as implementers from the several departments. The review may include but is not limited to:
  - Plant's significant ES risks
  - E&S performance against determined targets (e.g. air emission levels, wastewater treatment quality, volume of waste generated etc.)
  - Number of complaints received from both internal and external stakeholders.
  - Compliance levels against regulatory requirements, internal audits, international standards etc.
  - Corrective and preventive actions issued and status period.
- Management should provide inputs and recommendations for improvement.

- Record performance from the preceding year into the ESSPR template for submission to CGIF on an annual basis. Details required to be included are:
  - A review of the environmental and social performance in the preceding year with respect to compliance of the requirements of this ESMS.
  - A summary of non-conformances (if any) and corrective actions implemented/proposed in the preceding year.
  - A summary of stakeholder engagement activities and feedback received.
- Feedback from the meeting and performance review should be communicated to relevant personnel in order to update the ESMS and support the continuous improvement of the system.

#### Relevant Documents

- Meeting Minutes

## APPENDICES

## APPENDIX A: ESMS Committee Appointment Letter



## ANNOUNCE

AT SNC 053/2022

Subject : Appointment of Environmental and Social Management System (ESMS) Working Group

According to SNC Former Public Company Limited and subsidiaries affiliates have a policy to establish an Environmental and Social Management System (ESMS) for maximum efficiency in the project implementation, it is considered to appoint a working group as follows:

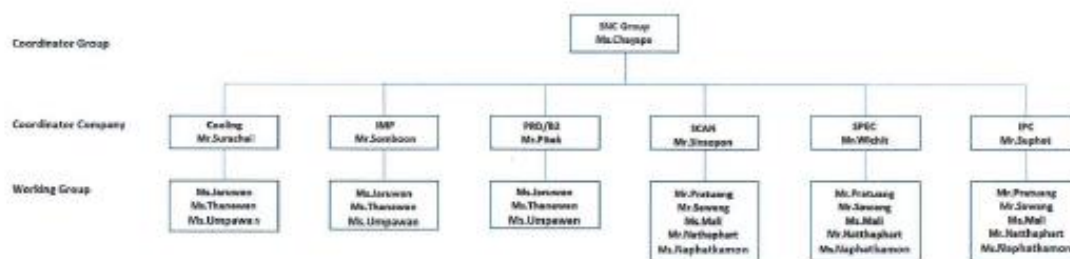
Name – Surname		Position	Company
1. Ms.Chayapa	Thaisanguanvorakul	Coordinator Group	SNC Group
2. Mr.Surachai	Chainarong	Coordinator Company	SNC-Cooling
3. Mr.Somboon	Gurdlin	Coordinator Company	SNC-IMP
4. Mr.Pitak	Siriwat	Coordinator Company	SNC-B2/PRD
5. Mr.Sinsopon	Nunnarumitr	Coordinator Company	SNC-SCAN
6. Mr.Vichid	Yoksuwan	Coordinator Company	SNC-SPEC
7. Mr.Supot	Thangpipatpairee	Coordinator Company	SNC-IPC
8. Ms.Jaruwan	Wuttiapradit	Working Group	SNC-WEST
9. Ms.Thanawan	Pantahome	Working Group	SNC-WEST
10. Ms.Umpawan	Sangkum	Working Group	SNC-WEST
11. Mr.Pratuang	Noiarsa	Working Group	SNC-EAST
12. Mr.Sawang	Bootmanee	Working Group	SNC-EAST
13. Ms.Mali	Jampatip	Working Group	SNC-EAST
14. Ms.Naphatkamon	Larakhee	Working Group	SNC-EAST
15. Mr.Nathaphart	Bangkerd	Working Group	SNC-EAST



บริษัท เอส เอ็น ซี ฟอเมอร์ จำกัด (มหาชน)  
SNC FORMER PUBLIC COMPANY LIMITED

### Working Group Structure (ESMS)

ESMS Organization Chart



Therefore announced for acknowledgment and compliance by all

Announced on October 20, 2022

(Miss Sineenart Theisanguanvorakul)  
Assistant Chairman of the Executive Committee  
SNC Former Public Company Limited

( Mr. Somchai Ngankitcharoenlap )  
Vice Chairman Of Executive Committee  
SNC Former Public Company Limited

333/6 หมู่ที่ 6 ตำบลบางเพรียง อำเภอบางบ่อ จังหวัดสมุทรปราการ 10560  
333/6 Moo 6 Bangprieng District, Amphur Bangbo, Samutprakam 10560  
Tel: (662) 108-0370-756 Fax: (662) 108-0367-68 E-Mail: snc@sncformer.com



## APPENDIX B: Asian Development Bank Prohibited Activity List

The following do not qualify for Asian Development Bank financing:

- (i) Production or activities involving harmful or exploitative forms of forced labour or child labour;
- (ii) Production of or trade in any product or activity deemed illegal under host country laws or regulations or international conventions and agreements or subject to international phase outs or bans, such as (a) pharmaceuticals, pesticides, and herbicide, (b) ozone-depleting substance, (c) polychlorinated biphenyls and other hazardous chemicals, (d) wildlife or wildlife products regulated under the Convention on International Trade in Endangered Species of Wild Fauna and Flora, and (e) transboundary trade in waste or waste products;
- (iii) production of or trade in weapons and munitions, including paramilitary materials;
- (iv) production of or trade in alcoholic beverages, excluding beer and wine;
- (v) production of or trade in tobacco;
- (vi) gambling, casinos, and equivalent enterprises;
- (vii) production of or trade in radioactive materials, including nuclear reactors and components thereof;
- (viii) production of, trade in, or use of unbonded asbestos fibers;
- (ix) commercial logging operations or the purchase of logging equipment for use in primary tropical moist forests or old-growth forests; and
- (x) marine and coastal fishing practices, such as large-scale pelagic drift net fishing and fine mesh net fishing, harmful to vulnerable and protected species in large numbers and damaging to marine biodiversity and habitats.

Remark: <sup>1</sup>Forced labour means all work or service not voluntarily performed, that is, extracted from individual under treat or force or penalty.

## APPENDIX C: Involuntary Resettlement Screening Checklist

Appendix C. Involuntary Resettlement Screening Checklist

No.	Involuntary Resettlement Screening Checklist (Additional information to be provided in 'Remarks')	Status			Remarks
		Yes	No	Not Known	
<b>Involuntary Acquisition of Land</b>					
1	Will there be involuntary land acquisition?				
2	Is the site for land acquisition known?				
3	Is the ownership status and current usage of land to be acquired known?				
4	Will easement be utilised within an existing right of way (ROW)?				
5	Will there be loss of shelter and residential land due to land acquisition?				
6	Will there be loss of agricultural and other productive assets due to land acquisition?				
7	Will there be losses of crops, trees, and fixed assets due to land acquisition?				
8	Will there be loss of businesses or enterprises due to land acquisition?				
9	Will there be loss of income sources and means of livelihoods due to land acquisition?				
<b>Involuntary Restrictions on Land Use or on Access to Legally Designated Parks and Protected Areas</b>					
10	Will people lose access to natural resources, communal facilities and services?				
11	If land use is changed, will it have an adverse impact on social and economic activities?				
12	Will access to land and resources owned communally or by the state be restricted?				
<b>Information on Displaced Person:</b>					
13	Any estimate of the likely number of persons that will be displaced by the potential project?				[project estimate number]
14	Are any of them poor, female-heads of households, or vulnerable to poverty risks?				
15	Are any displaced persons from indigenous or ethnic minority groups?				
<b>Involuntary Resettlement Categorization</b>		<b>Prepared by:</b>			
	<input type="checkbox"/> A - Significant IR Impacts (≥ 200 people will lose their shelter/ housing or when ≥ 200 people will lose at least 10% of their productive assets) <input type="checkbox"/> B - Insignificant IR Impacts (< 200 people affected) <input type="checkbox"/> C - No impacts				

## APPENDIX D: Indigenous Peoples Impact Screening Checklist

Appendix D. Indigenous Peoples Impact Screening Checklist

No.	Indigenous Peoples Impact Screening Checklist <i>(Additional information to be provided in 'Remarks')</i>	Status			Remarks
		Yes	No	Not Know	
<b>Indigenous Peoples Identification</b>					
1	Are there socio-cultural groups present in or use the subproject area who may be considered as "tribes" (hill tribes, scheduled tribes, tribal peoples), "minorities" (ethnic or national minorities), or "indigenous communities" in the subproject area?				
2	Are there national or local laws or policies as well as anthropological researches/studies that consider these groups present in or using the subproject area as belonging to "ethnic minorities", scheduled tribes, tribal peoples, national minorities, or cultural communities?				
3	Do such groups self-identify as being part of a distinct social and cultural group?				
4	Do such groups maintain collective attachments to distinct habitats or ancestral territories and/or to the natural resources in these habitats and territories?				
5	Do such groups maintain cultural, economic, social, and political institutions distinct from the dominant society and culture?				
6	Do such groups speak a distinct language or dialect?				
7	Have such groups been historically, socially and economically marginalized, disempowered, excluded, and/or discriminated against?				
8	Are such groups represented as "indigenous Peoples" or as "ethnic minorities" or "scheduled tribes" or "tribal populations" in any formal decision-making bodies at the national level?				
<b>Identification of Potential Impacts</b>					
9	Will the subproject directly or indirectly benefit or target Indigenous Peoples?				
10	Will the subproject directly or indirectly affect Indigenous Peoples' traditional socio-cultural and belief practices? (e.g. child-rearing, health, education, arts, and governance)?				
11	Will the subproject affect the livelihood systems of Indigenous Peoples? (e.g., food production system, natural resource management, crafts and trade, employment status)?				
12	Will the subproject be in an area (land or territory) occupied, owned, or used by Indigenous Peoples, and/or claimed as ancestral domain?				
<b>Identification of Special Requirements</b>					
13	Commercial development of the cultural resources and knowledge of Indigenous Peoples?				
14	Physical displacement from traditional or customary lands?				
15	Commercial development of natural resources (such as minerals, hydrocarbons, forests, water, hunting or fishing grounds) within customary lands under use that would impact the livelihoods or the cultural, ceremonial, spiritual uses that define the identity and community of Indigenous Peoples?				
16	Establishing legal recognition of rights to lands and territories that are traditionally owned or customarily used, occupied or claimed by Indigenous Peoples?				
17	Acquisition of lands that are traditionally owned or customarily used, occupied or claimed by Indigenous Peoples?				
<b>Indigenous Peoples Categorization</b>		<b>Prepared by:</b>			
<input type="checkbox"/> A - Significant IP Impacts <input type="checkbox"/> B - Insignificant IP Impacts <input type="checkbox"/> C - No Impacts					

## APPENDIX E: Rapid Environmental Assessment (REA) Checklist

Appendix E. Rapid Environmental Assessment (REA) Checklist

No.	Rapid Environmental Assessment (REA) Checklist <i>(Additional information to be provided in 'Remarks')</i>	Status			Remarks
		Yes	No	Not Known	
<b>Project Siting</b>					
1	Is the Project area adjacent to or within any of the following environmentally sensitive areas?				
A	- Cultural Heritage Site				
B	- Legally Protected Area (including Buffer Zone)				
C	- Wetland				
D	- Mangrove				
E	- Estuarine (Reptiles)				
F	- Special Area for Protecting Biodiversity				
<b>Potential Environmental Impacts</b>					
2	Will the Project cause:				
A	- Impairment of historical/cultural areas; disfiguration of landscape or potential loss/damage to physical cultural resources?				
B	- Disturbance to precious ecology (e.g. sensitive or protected areas)?				
C	- Alteration of surface water hydrology of waterways resulting in increased sediment in streams affected by increased soil erosion at construction site?				
D	- Deterioration of surface water quality due to silt runoff and sanitary wastes from worker-based camps and chemicals used in construction?				
E	- Increased air pollution due to construction and/or operation activities?				
F	- Noise and vibration due to project construction and/or operation activities?				
G	- Poor sanitation and solid waste disposal in workers accommodation and work sites? Creation of temporary breeding habitats for diseases such as those transmitted by mosquitoes and rodents?				
H	- Possible transmission of communicable diseases (such as STIs and HIV/AIDS) from imported workers to local populations?				
I	- Social conflicts if workers from other regions or countries are hired?				
J	- Large population influx during project construction and/or operation that causes increased burden on social infrastructure and services (such as water supply and sanitation systems)?				
K	- Risks and vulnerabilities related to occupational health and safety due to physical, chemical and biological hazards during project construction and operation?				
L	- Risks to community health and safety due to the transport, storage, and use and/or disposal of hazardous materials during construction and operation?				
M	- Community safety risks due to both accidental and natural causes, especially where the structural elements or components of the project are accessible to members of the affected community or where their failure could result in injury to the community throughout project construction, operation and decommissioning?				
N	- Generation of solid waste and/or hazardous waste?				
O	- Use of chemicals?				
P	- Generation of wastewater during construction or operation?				
Q	- Consume significant resources (water, materials) for its operations? Would the resources consumption be competing against community uses?				
<b>Climate Risk and Impacts</b>					
3	Is siting and/or routing of the project (or its components) likely to be affected by climate conditions including extreme weather related events such as floods, droughts, storms, landslides?				
4	Generate significant Green House Gas emissions from its operations.				
5	Consume large quantities of fuel and/or energy for its operations.				
<b>Environmental Categorization</b>		<b>Prepared by:</b>			
	<input type="checkbox"/> A - Significant Environmental Impacts <input type="checkbox"/> B - Insignificant Environmental Impacts <input type="checkbox"/> C - No Impacts				

## APPENDIX F: Environmental and Social Screening

Appendix F. Screening Checklist

No.	Items	Status	Findings Identified	Next Steps
<b>General Project Information</b>				
Project Location:				
Description of project type/ activity:				
Proximity from the closest sensitive receptors (e.g. Biodiversity conservation sites, legally protected areas, local community etc.):				
1	<b>Environmental and Social Permitting</b> - Does the potential activity require permit approval, environmental impact assessment or require other environmental and social permits for commencing operations? <b>Supporting Links</b> Review local regulatory requirements, confirmation can be made with respective permitting authorities.			
2	<b>Asian Development Bank Prohibited Investment Activities List</b> Potential activity is not related to any of the following: - Involving harmful or exploitative form of forced labour or child labour - Production or trade of any products/ activities deemed illegal (e.g. pharmaceuticals, pesticides, herbicides, ozone-depleting substances, polychlorinated biphenyls, other hazardous chemicals, wildlife under the Convention on International Trade in Endangered Species of Wild Fauna and Flora and transboundary trade in waste) - Production/ trade of weapons, munitions and paramilitary materials - Production/ trade of alcoholic beverages - Production/ trade of tobacco - Gambling, casinos or equivalent - Production/ trade of radioactive materials, nuclear reactors and components - Production/ trade/ use of unbounded asbestos fibres - Commercial logging operations/ purchase of logging equipment for use in primary tropical noise forests <b>Supporting Links</b> <a href="https://www.adb.org/sites/default/files/institutional-document/32056/safeguard-policy-statement-june2009.pdf">https://www.adb.org/sites/default/files/institutional-document/32056/safeguard-policy-statement-june2009.pdf</a>			
3	<b>Environmentally Sensitive Area</b> - Is the potential project adjacent to or located within any of the following environmentally sensitive area? - IUNC Red List - UNESCO World Cultural and Natural Heritage - World Database on Protected Area <b>Supporting Links</b> <a href="https://www.iucnredlist.org/">https://www.iucnredlist.org/</a> <a href="http://whc.unesco.org/en/list/">http://whc.unesco.org/en/list/</a>			
4	<b>Natural Hazards/ Disaster Sensitive Areas</b> - Is the project located in an area with high potential of natural disasters (e.g. flooding/ drought) risks? <b>Supporting Links</b> <a href="http://w101.ddd.go.th/index.php/2017-05-23-02-00-40">http://w101.ddd.go.th/index.php/2017-05-23-02-00-40</a> <a href="https://lood.gisda.or.th/">https://lood.gisda.or.th/</a>			
5	<b>Human Rights</b> - Does the potential activity have possibility to be related to controversial human rights issue, or attract possible international concerns (i.e. Tier 2, Tier 3) <b>Supporting Links</b> Review on publicly available information if project poses any human rights risk, any past reports on human rights violations or past/ pending finds/ prosecution/ notices			
6	<b>Land Acquisition</b> - Is the Project located in an area with unclear/ prohibited land ownership? - Is there community sensitive area which may cause delays/ issues/ conflicts with land ownership? For example: - Limited from receiving land certificate utilization - Area no granted for industrial use - Adjacent to local communities and impose negative perception from communities regarding manufacturing facility <b>Supporting Links</b> Consultation with land authority (e.g. town planning) and review publicly available information on neighbouring facility <a href="http://sol.ddd.go.th/ddddata/mapsol/E1.html">http://sol.ddd.go.th/ddddata/mapsol/E1.html</a>			
7	<b>Involuntary Resettlement</b> - Check the possibility of causing involuntary resettlement of people in the forms of physical and/or economic displacement (e.g. loss of asset/ access to asset, means of livelihood) <b>Supporting Links</b> Review publicly available information on project setting Identify density of local community and possible impacts <a href="https://asa.or.th/en/online3">https://asa.or.th/en/online3</a> <a href="#">Involuntary Resettlement Screening Checklist</a>			
8	<b>Indigenous People</b> - Check presence of indigenous people located nearby to the project site - Is there a possibility that the Project would directly cause negative impacts on the indigenous community? <b>Supporting Links</b> <a href="https://www.thaiportal.info/geo-informatics">https://www.thaiportal.info/geo-informatics</a> <a href="#">Indigenous People Screening Checklist</a>			

## APPENDIX G: Environmental and Social Risk Assessment Register

Appendix G: E&amp;S Risk Assessment

Date:				Department:									Rev:	
No.	Activity (List out steps for each activity)	E&S Aspects	E&S Impacts	Conditions (N, AB, E)	Regulation Applicable?	Air	Water	Soil	Env.	Labour	Comm.	Total	Frequency	Overall
1												0		0
2												0		0
3												0		0
4												0		0
5												0		0
6												0		0
7												0		0
8												0		0
9												0		0
10												0		0
11												0		0
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30												0		0

## APPENDIX H: E&S Legal Compliance Register

Appendix H: Environmental and Social Legal Compliance Register

Date:													Rev:
No.	Aspect	Name of Regulation/Notification/ Requirements	Governing Body/ Customer	Announcement Date	Effective Date	Key Contents	Applicable Companies						Reference Source
							SNC	IMP	PRD	SCAN	SPEC	IPC	
1													
2													
3													
4													
5													
6													
7													
8													
9													
10													
11													
12													

**APPENDIX I: The R22 Phase Out Plan**

15 December 2022

**The R22 phase out plan**

ปัจจุบันบริษัทใช้สารทำความเย็นชนิด R22 ในระบบเครื่องปรับอากาศซึ่งมีผลกระทบต่อสภาพโลกร้อน โดยบริษัทมีแนวทางในการยุติการใช้สารทำความเย็นดังกล่าว ดังนี้

Currently, the company uses R22 refrigerant in the air conditioning system which has impact to global warming. The company intends to stop using such refrigerants as follows:

แบบที่ 1 เครื่องปรับอากาศที่ใช้สารทำความเย็นชนิด R22 ซึ่งติดตั้งอยู่ในอาคารเกิดหลินและอาคารเลขที่ 5 บริษัทมีความตั้งใจจะนำเครื่องปรับอากาศรุ่นใหม่ที่ใช้สารทำความเย็นชนิด R32 มาเปลี่ยนแทนภายใน 5 ปี (ปี 2023-2027)

Type 1: Air conditioner that uses R22 refrigerant, which is installed at the Building No.1 and Building No. 5. The company intends to install new air conditioners that uses R32 refrigerant to replace R22 within 5 years (2023-2027).

แบบที่ 2 เครื่องปรับอากาศที่ใช้สารทำความเย็นชนิด R22 เป็นเครื่องปรับอากาศที่ลูกค้าจ้างบริษัทผลิต บริษัทประเมินว่าเครื่องปรับอากาศรุ่นนี้จะหมดอายุการใช้งานภายใน 8 ปี (ปี 2023-2030) ซึ่งหากเครื่องปรับอากาศรุ่นนี้ยังไม่มีการเปลี่ยนไปใช้น้ำยาชนิดใหม่ที่ดีกว่าเช่น น้ำยา R32 ภายในปี 2030 บริษัทมีความตั้งใจจะผลิตเครื่องปรับอากาศรุ่นที่ใช้น้ำยา R22 ในปี 2030 เป็นปีสุดท้าย

Type 2: A customer orders the company produces the air conditioners that use R22 refrigerant. The company expects that the life of the models will be expired by 8 years (2022-2030) and the models will be modified to use new refrigerant such as R32 instead of R22. The company intends to produce the R22 air-conditioner not longer than 2030.



Mr. Somchai Ngamkitcharoenlap  
Vice Chairman of the Executive Committee

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## APPENDIX J: EHS Training Plan



EHS Training Plan

## APPENDIX K: Communication plan



Communication Plan

**APPENDIX L: Grievance Register****Appendix L. Grievance Register**

Date:										Rev:
No.	Grievance Raised by	Topic of Complaint	Brief Details	Root Cause	CAPA Ref.	Grievance Details				Remarks
						Received date	Status (Open/Closed)	Closed Date	Days to resolve	
1										
2										
3										
4										
5										
6										
7										
8										
9										
10										
11										
12										
13										
14										
15										
35										

## APPENDIX M: Procurement Policy



Procurement Policy

## APPENDIX N: Supplier Code of Conduct



Supplier Code of  
Conduct

## APPENDIX O: Supplier Evaluation Performance Report

### Appendix O. Supplier Evaluation Performance Report

Date:							Rev:	
<b>Section 1: Supplier General Information</b>								
Name:								
Address:								
Telephone:								
Primary Contact:								
Mobile:								
Email:								
Service type:								
Description of Service Provided:								
<b>Section 2: Supplier Screening Requirements</b>								
1. Does the supplier conduct activities listed in the ADB Prohibited Investment Activity List?								
2. Does the supplier have a Environmental and Social Management System that can be implemented?								
3. Is the ESMS system certified or in alignment with international standards?								
4. Is the ESMS integrated with any other management systems of the company?								
5. Are any of the labour provided under the age of 15, foreign workers, or may impose issues regarding human rights?								
6. Has the company communicated working conditions, commitment to forced labour, fair labour practices and health and safety?								
7. Does the supplier's activity or service provided impose significant environmental and social impacts that cannot be avoid?								
8. Has SNC's Procurement Policy been communicated for alignment?								
9. Has SNC's Supplier Code of Conduct been communicated and acknowledged?								
- To comply with all applicable regulatory regulations								
- To conduct business ethically with good governance.								
- To be respectful of basic human rights								
- To practice fair labour and comply with regulations on compensation and wages								
- To maintain a safe and healthy workplace for all personnels working at the Site and on behalf of SNC.								
- To control, manage and mitigate environmental risks and ensure compliance with environmental standards								
- To report any conflicts are issues and concerns through the whistle blowing process.								
<b>Section 3: Supplier E&amp;S Performance Reporting</b>								
<b>Performance indicators</b>	<b>JAN</b>	<b>FEB</b>	<b>MAR</b>	<b>APR</b>	<b>MAY</b>	<b>JUN</b>	<b>Total</b>	
Total number of employees hour worked								
Number of Work-Related Fatalities								
Number of injuries recorded								
Number of regulatory citations/ violations received								

## APPENDIX P: Corrective Action Request Form

### Appendix P. Corrective Action Request: CAR

<b>Monitoring and Reporting</b>	<b>Date:</b>	<b>CAR No:</b>
<b>CAR Initiator:</b>	<b>Date Issued:</b>	
<b>Responsible Person:</b>	<b>Issuing Dept:</b>	
Non-conformity type: <input type="checkbox"/> Regulatory Non-compliance <input type="checkbox"/> MS Non-compliance <input type="checkbox"/> Observation <input type="checkbox"/> Area of concern		
<b>Details of Non-conformity</b>		
<b>Nonconformity:</b>		
<b>Root Cause:</b>		
<b>Corrective and Preventive Action:</b>		
<b>Responsible Department:</b>		
<b>Assigned Completion Date:</b>		
<b>Lead Auditor</b>	<b>Auditee</b>	<b>ESMS Co-ordinator</b>
<b>Date:</b>	<b>Date:</b>	<b>Date:</b>
<b>Follow-up Action:</b>		
<b>CAR Status:</b> <input type="checkbox"/> Open <input type="checkbox"/> Closed		

